



June 23, 1993

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: PR Docket No. 93-61

Dear Ms. Searcy:

I am writing to express the views of the Automatic Identification Manufacturers Association (AIM^{USA}) Radio Frequency Identification Committee membership on a Notice of Proposed Rule Making (NPRM) released by the FCC in April 1993. The NPRM proposes to substantially revise the rules in Parts 90.239 governing Automatic Vehicle Monitoring (AVM) systems.

BACKGROUND

AIM^{USA} is a trade organization representing the majority of automatic identification manufacturers, distributors and systems integrators in the United States. The Radio Frequency Identification Committee is made up of members representing manufacturers and distributors of RFID Technology which operates within many frequency bands and under a wide range of FCC rules from Parts 15 to Part 90. The members of the RFID Committee organizations represent the majority of all the United States RFID installations in manufacturing security, animal management, access control, auto equipment identification and automatic vehicle monitoring. AIM^{USA} and the RFID Committee's goal is to serve its membership by expanding the marketplace for the goods and services offered by automatic identification manufacturers in the United States.

CONCLUSION

The effect of the NPRM would be counter to the goal of expanding the marketplace by granting de facto exclusive use of a large portion of the spectrum (904-912, 918-926 MHz) to a narrow class of users (Broad and Band Pulse Ranging Systems), thus effectively reducing the available spectrum for all others (902-904, 912-918, 926-928 MHz). The NPRM also would require a relocation of frequencies being used by existing users and the costly redesign or abandonment of manu existing and planned development efforts